

NO. PD-0981-16  
03-13-00382-CR

KEITH BALKISSOON  
Appellant

\* IN THE COURT OF  
\*

FILED  
COURT OF CRIMINAL APPEALS  
3/6/2017  
ABEL ACOSTA, CLERK

VS.

\* CRIMINAL APPEALS  
\*  
\*

THE STATE OF TEXAS  
Appellee

\*  
\* AT AUSTIN, TEXAS

**MOTION FOR EXTENSION OF TIME TO FILE BRIEF  
FOR DISCRETIONARY REVIEW**

TO THE HONORABLE JUDGES OF THE COURT OF CRIMINAL APPEALS:

COMES NOW, KEITH BALKISSOON, Appellant, and files this Motion for an Extension in which to file a Petitioner for Discretionary Review. In support of this motion, Petitioner shows the Court the following:

**I.**

The Petitioner's appeal was affirmed by the Third Court of Appeals on April 13, 2016, Motion for Rehearing and Rehearing En Banc were denied on July 26, 2016. This Court granted PDR on January 25, 2017, and ordered Petitioner's brief to be submitted on February 24, 2017. Petitioner has requested no previous extensions on the Petitioner's Brief to the Court.

## **II.**

Pursuant to Texas Rules of Appellate Procedure 68.2(c) Petitioner would hereby request an extension of time in which to file his P.D.R.

## **III.**

Attorney for the Petitioner would further show the Court that he has been diligent in preparing Appellant's application in this case. Counsel's father passed away two weeks ago, and Counsel had to be in Houston to assist in funeral preparations. Counsel was unable to work on the brief due to the family emergency, and counsel is unable to complete the brief in the time remaining.

WHEREFORE, Appellant prays the Court grant this Motion and extend the deadline for filing the Petitioner's Brief to March 13, 2017.

Respectfully Submitted,

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ARIEL PAYAN  
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CERTIFICATE OF SERVICE

By my signature above I hereby certify that a true and correct copy of the above and foregoing Motion for Extension of Time to File Petition for Discretionary Review has been delivered to the Criminal District Attorney, on March 3, 2017.